

Fact Sheet



For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: R30-04900038-2008
Application Received: October 29, 2007
Plant Identification Number: 049-00038
Permittee: Novelis Corporation
Facility Name: Fairmont Plant
Mailing Address: P. O. Box 912, Fairmont, WV 26555-0912

Physical Location: Fairmont, Marion County, West Virginia
UTM Coordinates: 577.0 (km) Easting • 4372.00 (km) Northing • 17 Zone
Directions: From Charleston, WV, take I-79 to Fairmont, WV, to exit 137. Turn left at bottom of the ramp onto Route 310 West to Speedway Ave. Follow Speedway Ave. approximately 1.2 miles to plant. The Plant is on the left.

Facility Description

The Novelis Corporation Fairmont Plant consists of aluminum cold rolling mill, annealing furnaces, slitter lines, scrap bailer, food grade lubricant coating line, and equipment to recover coolant lubricant. The aluminum coils are received from off-site sources by truck and are rolled and/or re-rolled to a desired gauge, annealed to specified temper, coated and/or slit to desired width per customer specifications. Then the final product is packaged for shipment. The aluminum coils are transferred manually to and from each operation by overhead cranes or industrial trucks. The facility has the potential to operate twenty-fours (24) hours a day for seven (7) days per week for fifty-two (52) weeks a year.

Emission Summary

Plantwide Emissions Summary [Tons per Year]		
Criteria Pollutants	Potential Emissions	2007 Actual Emissions
Carbon Monoxide (CO)	15.8	4.95
Nitrogen Oxides (NO _x)	21.1	5.87
Particulate Matter (PM _{2.5})	22.8	2.33
Particulate Matter (PM ₁₀)	22.8	2.33
Total Particulate Matter (TSP)	22.8	2.33
Sulfur Dioxide (SO ₂)	0.12	0.03
Volatile Organic Compounds (VOC)	481	279.1
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2007 Actual Emissions
Total HAPs	0.34	0
<i>Some of the above HAPs may be counted as PM or VOCs.</i>		

Title V Program Applicability Basis

This facility has the potential to emit over 100 tons per year of VOC. Due to this facility's potential to emit over 100 tons per year of this pollutant, Novelis Corporation's Fairmont Plant is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR6	To prevent and control air pollution from combustion of refuse
	45CSR7	To prevent and control particulate air pollution from manufacturing process operations
	45CSR10	To prevent and control air pollution from the emission of sulfur oxides
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Permits for construction, modification, relocation and operation of stationary sources
	45CSR30	Operating permit requirement.
	40 C.F.R. Part 61	Asbestos inspection and removal
State Only:	45CSR4	No objectionable odors.

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to request any pertinent information such as annual emission inventory reporting is provided in WV Code § 22-5-4(a)(14). The Secretary's authority to require standards under 40 C.F.R.

Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR15, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2268B	April 2, 2008	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

This is a renewal of the Title V Permit. Since the original Title V Permit was issued, the following changes have been made:

Permit R13-2268B was issued to administratively update Permit R13-2268A. In the administrative update, the coating lines were decommissioned. Section 6.0. of the original Title V Permit listed the requirements for the coating lines, therefore this section was removed.

Annealing Furnaces #3, #4, #5, #6, #7, and #8 and Purge Gas Generators #1, #2, and #3

It was determined during the renewal process that the annealing furnaces (002-01, 002-02, 002-03, 002-04, 002-08, and 002-09) and purge generators (002-05, 002-06, and 002-07) are direct fired units. They are not considered indirect heat exchangers subject to 45CSR2 but manufacturing source operations subject to 45CSR7. Therefore all conditions related to 45CSR2 were replaced with conditions from 45CSR7. The annealing furnaces simply reheat the metal for processing. The purge generators supply combustion gases to the annealing furnaces to purge oxygen. The annealing furnaces and purge generators are subject to process weight rate limits; however no PM emissions are expected other than from the combustion of natural gas. According to AP-42 emission factor Table 1.4-2, PM is emitted at a rate of 7.6 lbs/MMscf. The maximum fuel consumption rate of all the annealing furnaces is 0.0412 MMscf/hr and the PM emission rate calculates to be 0.313 lbs/hr. The maximum fuel consumption rate of all the purge generators is 0.053 MMscf/hr and the PM emission rate calculates to be 0.403 lbs/hr. None of these sources have actual emissions greater than the 6 pph that would require an NSR permit. Therefore, these sources shall monitor PM emissions by conducting visible emissions checks.

Similarly, the annealing furnaces and purge generators are not subject to the fuel burning weight emission standards of 45CSR§10-3.1. but are subject to the manufacturing process weight emissions standards of 45CSR§10-4.1. However, the total potential emissions of sulfur dioxide from these sources is less than 500 pounds/year, therefore these sources are exempt from 45CSR§10-4.1. in accordance with 45CSR§10-4.1.e.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

45CSR§10-5.1. This process is not defined as a refinery process gas stream or any other process gas stream that contains hydrogen sulfides to be combusted.

45CSR§21-12. This regulation does not apply to the cold type rolling mill facility since it is not located in one of the five counties mentioned in the regulation.

40 C.F.R. 60, Subparts K, Ka, and Kb	There are no tanks that were constructed between June 11, 1973 and July 23, 1984 (subparts K and Ka). There are no tanks that were constructed after July 23, 1984 that are greater than 75 m ³ (subpart Kb).
40 C.F.R. 60, Subpart TT	This facility no longer engages in Metal Coil Surface Coating
40 C.F.R. 63, Subpart SSSS	This regulation does not apply because there are no longer coating lines in use.
40 C.F.R. 64	Rolling Mills #1 and #2 are major sources of VOCs, however the only control devices installed on these units are for PM. The annealing furnaces and purge generators do not have control devices. Therefore, this facility is not subject to CAM in accordance with 40 C.F.R. 64.2(a)(2).

Request for Variances or Alternatives

None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: July 1, 2008
Ending Date: July 31, 2008

All written comments should be addressed to the following individual and office:

Bobbie Scroggie
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Bobbie Scroggie
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304
Phone: 304/926-0475 • Fax: 304/926-0479

Response to Comments

No comments received.